

April 30, 2007

Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
Room TW B-204
445 12th Street, S.W.
Washington, DC 20554

**Re: Alarm Industry Analog Sunset Petition; WT Docket No. 01-108,
RM-11355**

Dear Ms. Dortch:

CTIA – The Wireless Association® (“CTIA”) and the undersigned carriers hereby file this letter opposing an extension of the sunset date by two years, *i.e.*, to February 18, 2010, for the requirement that carriers provide analog service compatible with Advanced Mobile Phone Service (“AMPS”) specifications, as requested by the Alarm Industry Communications Committee (“AICC”) and ADT Security Services Inc. (“ADT”).

In its 2002 Biennial Review Order, the Federal Communications Commission (“FCC” or “Commission”) set a date for the sunset of required analog service, citing its negative effects on competition.¹ The Commission specifically observed that maintaining an analog service requirement impedes competition by mandating use of an inherently spectrum-inefficient technology and imposing higher costs on carriers that have upgraded to digital networks or are in the process of doing so.² As a result of that Order, many large and small carriers have planned their business models with an eye toward complete replacement of outdated and inefficient analog technology with the latest digital technology.

The analog requirement has taken a heavy economic and spectral efficiency toll on small and rural carriers. Maintaining analog capacity requires investment in outdated, and often discontinued, technology to serve a minimum number of customers. Indeed, carriers’ ability to obtain this analog equipment has become problematic due to the unreliability of market availability, quality and price. Smaller carriers often are especially hard hit in maintaining analog networks, at costs that can run into the millions of dollars per year, to serve a fraction of their customers. At least one carrier has estimated this cost to be 40% of their annual operating budget.³

¹ Year 2000 Biennial Regulatory Review – Amendment of Part 22 of the Commission’s Rules to Modify or Eliminate Outdated Rules Affecting Cellular Radiotelephone Service and Other Commercial Mobile Radio Services, Report and Order, 17 FCC Rcd 18401 at para. 10 (2002).

² See *id.* at paras. 8-12.

³ See ACS Wireless, Inc.’s Response to Public Notice Concerning Need for New Rules Extending Analog Sunset Date, RM-11355, at 6 (Jan. 19, 2007).

Another carrier, Carolina West Wireless, estimates that its current expenditures for analog network maintenance amount to more than 4.5 times the revenue received from the analog customers it serves. In extreme cases, carriers maintain this second analog network in parallel to their more advanced digital network to serve a mere handful of customers.

Any extension of the sunset date for AMPS would place the burden of maintaining an antiquated technology, for the benefit of a few customers, on those small and rural carriers that are least likely to be able to bear that burden. We urge the Commission to maintain the current February 18, 2008 analog sunset date, upon which small and rural carriers have relied for network planning purposes, to deliver the most advanced, spectrally-efficient wireless services to their customers.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being electronically filed with your office. If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

/s/ Christopher Guttman-McCabe
Vice President, Regulatory Affairs
CTIA – The Wireless Association®

/s/ David C. Eisenberg
Senior Vice President, Corporate Strategy & Development
Alaska Communications Systems

/s/ Ronald R. Smith
President
Bluegrass Cellular, Inc.

/s/ Slayton S. Stewart
Chief Executive Officer
Carolina West Wireless

/s/ Cassy Carter
CEO / General Manager
Cellular One of East Central Illinois

/s/ James Moak
General Manager, Wireless Operations
Mohave Wireless

/s/ Richard Ruhl
General Manager
Pioneer / Enid Cellular

cc: Chairman Kevin Martin
Commissioner Michael Copps
Commissioner Jonathan Adelstein
Commissioner Deborah Taylor Tate
Commissioner Robert McDowell
Erika Olson
Bruce Gottlieb
Barry Ohlson
Aaron Golberger
Angela Giancarlo
Roger Noel
Richard Arsenault